

National Organic Standards Board  
c/o Arthur Neal; Room 4008 - South Building  
1400 Independence Avenue, SW  
Washington, D.C. 20250-0001.

Via email: NOSB.livestock@usda.gov

May 20, 2005

Re: Proposed Pasture Guidance

Dear members of the NOSB,

Thank you for the opportunity to comment on this proposed guidance policy. The Northeast Organic Farming Association chapters of New Jersey, New York, Rhode Island, and Vermont believe this policy will serve to clarify the standards regarding pasture in conjunction with the proposed regulation changes, which we also support. We support the comments filed by the Northeast Organic Dairy Producers Association (NODPA). We suggest re-inserting the sentence as stated in the 2001 NOSB recommendation – that “grazed feed must provide a significant portion of the total feed requirements.” This sentence provides the basic principal in support of the specific goals as minimum targets of 30% dry matter intake from grazing, and 120 days per year as a reasonable benchmark for organic producers. As guidance, we understand that these numbers are not absolute, but will serve to help standardize the interpretation by certification agencies. We also support reference to regional NRCS grazing standards as guidance for pasture management. We have suggested some changes in wording, so as not to imply that NRCS practices standards are an absolute requirement. The NRCS standards vary by region and are generally customized according to production goals set by the farmer for his/her operation, often in a contract situation with NRCS. Not all organic farmers will be working directly with NRCS in any given year, so this language should be tempered to recognize the non-binding nature of these standards.

In addition we share the NODPA concerns: 1) that Code 528 is a very general document, 2) that more specific NRCS documents such as Specification Guides do not seem to be universally available for all counties, 3) that it is not easy, without initial help, to find the relevant NRCS documents on their website and along with that, the fact that many producers do not have internet access, 4) that implementation of NRCS grazing standards are customized according to production goals set by the farmer for his/her operation so it must not be construed that an NRCS plan can override the minimum pasture benchmarks.

If the NRCS Standards can indeed provide guidance for appropriate ecological care of pasture regionally, can provide regionally appropriate stocking limits, and can work in concert with not only meeting the minimum benchmarks but in maximizing pasture intake, we are supportive of their use.

*Suggested changes:*

Proposed additions are underlined, and deletions ~~struck out~~:

**NOSB Livestock Committee Recommendation for Guidance  
Pasture Requirements for the National Organic Program  
March 2, 2005**

Guidance for interpretation of §205.239(a)(2)

A. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. *The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days.* The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements.

B) Appropriate Pasture Conditions

~~Appropriate pasture conditions shall be determined in accordance with~~ The regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) and related Specification Guides are a useful tool for determining appropriate pasture conditions for the number of animals in the Organic Systems Plan. Organic producers may use these practice standards to aid in development of a farm plan, subject to approval by the certification agent, that provides appropriate pasture for ruminants. Appropriate pasture provides feed value and maintains or improves soil, water, and vegetative resources. [from definition of pasture, 205.2]

BC. Temporary Confinement

Temporary confinement means the period of time when ruminant livestock are denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather) and instances of temporary confinement shall be the minimum time necessary. In no case shall temporary confinement be allowed as a continuous production system. All instances of temporary confinement shall be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed only in the following situations:

- 1) During periods of inclement weather such as severe weather occurring over a period of a few days during the grazing season;
- 2) Conditions under which the health, safety, or well being of an individual animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals;
- 3) To protect soil or water quality.

C) ~~Appropriate Pasture Conditions~~

~~Appropriate pasture conditions shall be determined in accordance with the regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan.~~

Thank you for providing leadership to develop these needed clarifications and for consideration of all the public comment on this important issue.

Sincerely,

Emily Brown Rosen for the Northeast Organic Farming Association of New Jersey  
John Cleary for the Northeast Organic Farming Association of Vermont  
Elizabeth Henderson for the Northeast Organic Farming Association of New York  
Fritz Vohr for the Northeast Organic Farming Association of Rhode Island